

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission On Its Own Motion)	
)	
Investigation Concerning Illinois Bell Telephone)	Docket No. 01-0662
Company's compliance with Section 271 of the)	
Telecommunications Act of 1996)	

SBC ILLINOIS' SECOND BIMONTHLY PROGRESS REPORT

Illinois Bell Telephone Company (“SBC Illinois” or “the Company”), by its attorneys, hereby files its Second Bimonthly Progress Report as required by ¶ 3608 of the Commission’s May 13, 2003 Order on Investigation. The attached progress report consists of a 21 page matrix (the “Second Report”) with 4 attachments. The Second Report is an updated version of the progress report matrix filed with the Commission on June 30, 2003. Changes to the June 30 report are shown in red-line format¹. The Second Report provides the current status on each of the 57 items set forth in Attachment B (The “Commitment List”) to the Order on Investigation. Of those 57 items, the Company is today reporting that a total of 40 items have been completed. With respect to the 17 remaining items, the Company is on schedule to meet its overall commitment and will provide a further status when the Third Bimonthly Report is filed on or before October 31, 2003.

¹ Both a clean and a red-line version of the Second Report are provided.

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY

One of Its Attorneys

Louise A. Sunderland
Mark R. Ortlieb
Illinois Bell Telephone Company
225 West Randolph, Floor 25D
Chicago, Illinois 60606
(312) 727-6705
(312) 727-2415

CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **SBC ILLINOIS' SECOND BI-MONTHLY PROGRESS REPORT** was filed with the Commission via e-docket and served upon all parties electronically on this 29th day of August, 2003.

Mark R. Ortlieb

SERVICE LIST FOR DOCKET 01-0662

Eve Moran
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60606
emoran@icc.state.il.us

Mary C. Albert
Allegiance Telecom of Illinois,
Inc.
1919 M Street NW
Suite 420
Washington, DC 20036
mary.albert@algx.com

Penny Bewick
New Edge Networks, Inc.
3000 Columbia House Blvd.
Vancouver, WA 98668
pbewick@newedgenetworks.com

Sean Brady
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60606
sbrady@icc.state.il.us

Allan Goldenberg, Cecely
Castillo, Mark N. Pera, Marie
Spicuzza
Cook Co. State's Attorney's
Office
69 West Washington , Suite
700
Chicago, IL 60602
agolden@cookcountygov.com
ccastil@cookcountygov.com
mpera@cookcountygov.com
saopib@wwa.com

Robin F. Cohn, Michael P.
Donahue, Eric J. Branfman
Swidler Berlin Shereff
Friedman
3000 K Street NW, Suite 300
Washington, DC 20007
rfcohn@swidlaw.com
mpdonahue@swidlaw.com

ejbranfman@swidlaw.com

Tamara E. Connor
Kelley Drye & Warren LLP
8000 Towers Crescent, Suite
1200
Vienna VA 22182
tconnor@kelleydrye.com

Susan L. Satter, Janice A. Dale
Illinois Attorney General's
Office
100 West Randolph St., 11th
Floor
Chicago, IL 60601
ssatter@atg.state.il.us
jdale@atg.state.il.us

Matt C. Deering, Dennis K.
Muncy, Joseph D. Murphy
Meyer Capel
306 West Church Street
PO Box 6750
Champaign IL 61826
mdeering@meyercapel.com
dmuncy@meyercapel.com
jmurphy@meyercapel.com

J. Tyson Covey, Kara Gibney,
Theodore A. Livingston,
Demetrios G. Metropoulos,
Angela O'Brien, Daniel
Parish, Hans J. Germann
Mayer Brown Rowe & Maw
190 South LaSalle
Chicago, IL 60603
jcovey@mayerbrownrowe.com
kgibney@mayerbrownrowe.com
tlivingston@mayerbrownrowe.com
demetro@mayerbrownrowe.com
aobrien@mayerbrownrowe.com
dparish@mayerbrownrowe.com
hgerman@mayerbrownrowe.com

Joseph E. Donovan, Henry T.
Kelly
O'Keefe Ashenden Lyons &
Ward
30 North LaSalle Street, Suite
4100
Chicago, IL 60602
henrykelly@okeefe-law.com
josephdonovan@okeefe-law.com

Carmen Fosco
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60601
cfosco@icc.state.il.us

Richard E. Heatter
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, NV 89129
rheatter@mpowercom.com

David A. Irwin, Loretta J.
Garcia
Irwin Campbell &
Tannenwald PC
1730 Rhode Island Avenue
NW
Washington, DC 20036
dirwin@ictpc.com
lgarcia@ictpc.com

Cheryl Urbanski Hamill, John
Gomoll
AT&T Communications
222 West Adams Street, Floor
15
Chicago, IL 60606
chamill@att.com
gomoll@att.com

Chris Graves
Illinois Commerce
Commission
527 East Capitol Avenue
Springfield, IL 62701
cgraves@icc.state.il.us

William A. Haas
McLeodUSA
6500 C Street, SW
P. O. Box 3177
Cedar Rapids, IA 52406-3177
whaas@mcleodusa.com

Matthew L. Harvey
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60601
mharvey@icc.state.il.us

Michael B. Hazzard
Kelley Drye & Warren LLP
8000 Towers Crescent, Suite
1200
Vienna VA 22182
mhazzard@kelleydrye.com

Peter R. Healy
TDS Metrocom, Inc.
525 Junction Road, Suite 6000
Madison, WI 53717
peter.healy@tdsmetro.com

Andrew O. Isar
Association of
Communications Enterprises
7901 Skansie Avenue, Suite
240
Gig Harbor, WA 98335
aisar@millerisar.com

Scott Kellogg
CoreComm Illinois, Inc.
70 West Hubbard Street, Suite
410
Chicago, IL 60610
scott.Kellogg@corecomm.com

Owen E. MacBride
Schiff Hardin & Waite
233 South Wacker Drive

6600 Sears Tower
Chicago, IL 60606
omacbride@schiffhardin.com

M. Gavin McCarty
Globalcom, Inc.
333 West Wacker, Suite 1500
Chicago, IL 60606
gmccarty@global-com.com

Thomas Rowland, Stephen J.
Moore, Kevin Rhoda
Rowland & Moore
77 West Wacker, Suite 4600
Chicago, IL 60601
tom@telecomreg.com
stephen@telecomreg.com
krhoda@telecomreg.com

Julie Musselman
Illinois Commerce
Commission
527 East Capital Avenue
Springfield, IL 62701
jmusselm@icc.state.il.us

Joy Nicdao-Cuyugan
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60601
jncuyuga@icc.state.il.us

David Nixon
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60601
dnixon@icc.state.il.us

Jack A. Pace
City of Chicago
30 North LaSalle, Suite 900
Chicago, IL 60602-2580
jpace@ci.chi.il.us

Patrick Phipps
Illinois Commerce
Commission
527 East Capital Avenue
Springfield, IL 62701
[pphipps@icc.state.il.us](mailto:ppphipps@icc.state.il.us)

Carol P. Pomponio
XO Illinois, Inc.
303 East Wacker
Concourse Level
Chicago, IL 60601
cpomponio@xo.com

Darrell S. Townsley
WorldCom
205 North Michigan, 11th
Floor
Chicago, IL 60601
darrell.townsley@wcom.com

Ron Walters
Z-Tel Communications, Inc.
601 South Harbour Island
Blvd.
Tampa, FL 33602
rwalters@z-tel.com

Michael Ward
Michael W. Ward, P.C.
1608 Barclay Blvd
Buffalo Grove, IL 60089
mwward@dnsys.com

Nancy Wells
AT&T Communications
913 South Sixth Street, Floor 3
Springfield, IL 62703
njwells@att.com

Torsten Clausen
Illinois Commerce
Commission
527 East Capitol Avenue
Springfield, IL 62701
tclausen@icc.state.il.us

Brett D. Leopold
Sprint
6450 Sprint Parkway
KSOPHN0212-2A461
Overland Park, KS 66251
[brett.d.leopold@mail.sprint.m
ail](mailto:brett.d.leopold@mail.sprint.mail)

Doug Price
Illinois Commerce
Commission
160 North LaSalle, Suite C-
800
Chicago, IL 60606
dprice@icc.state.il.us

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	Topic	Description of Commitment	Status
1	Opt-In Policies	SBC commits to post to its CLEC website language that generally sets forth its MFN obligations under Section 252(i) and its policies regarding the incorporation of tariffs by reference into ICAs.	On April 9, 2003, SBC Illinois posted language to the CLEC Online website that summarizes SBC's 13-State General "MFN" Policy, the Illinois-specific In and Out-of-Region Porting Requirement, and SBC Illinois' policy regarding the incorporation of tariffs by reference into interconnection agreements. This information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/interconnect/multi/SBC_13-State_MFN_Policy.pdf See Attachment 1. This commitment is completed.
2	UNE Rate Clarity	SBC commits to file tariff language clarifying the application of entrance facility and connection charges to EELs.	SBC Illinois filed a tariff to fulfill this commitment on April 3, 2003. The tariff became effective on May 19, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 20, Sheets 3 and 4. See Attachment 2. This commitment is completed.
3	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for various UNE-P scenarios.	On March 20, 2003, SBC Illinois posted to the CLEC Online website a matrix detailing the application of rates for the specified UNE-P scenarios. The information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/hb/amer/1706/IL%20Rate%20Application%20Guide%20for%20UNE-P.xls See Attachment 3. This commitment is completed.
4	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for EEL scenarios.	On March 25, 2003, SBC Illinois posted to the CLEC Online website a matrix detailing the application of rates for the specified EEL scenarios. The information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/hb/amer/1719/IL%20Rate%20Application%20Guide%20for%20Enhanced%20Extended%20Loo

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	Topic	Description of Commitment	Status
			p.pdf See Attachment 4. This commitment is completed.
5	TELRIC Compliant UNE Rates	SBC commits to lower subloop rates to levels proposed in Wardin Affidavit.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 16, Sheets 10, 12 and 16. See Attachment 5. This commitment is completed.
6	TELRIC Compliant UNE Rates	SBC commits to lower two line connection subloop NRCs to California level.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 16, Sheet 14. See Attachment 6. This commitment is completed.
7	TELRIC Compliant UNE Rates	SBC commits to lower CNAM query rate to Michigan rate of \$.007932.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 17, Sheet 2. See Attachment 7. This commitment is completed.
8	TELRIC Compliant UNE Rates	SBC commits to file true-up language in tariff for identified “interim” UNE rates.	SBC Illinois filed tariffs to fulfill this commitment on February 28, 2003 and March 17, 2003. The tariffs became effective on March 1, 2003 and March 18, 2003. The modified language is located in the following tariffs: Ill. C.C. Tariff 20, Part 19, Section 2, Sheet 32; Section 3, Sheet 40; Section 16, Sheets 10 through 16; Section 17, Sheet 2; Section 18, Sheets 8 and 9; and Section 20, Sheets 4 through 6. See Attachment 8.

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			This commitment is completed.
9	UNE-P Billing Accuracy	<p>SBC commits to correct ICA billing errors associated with UNE-P billing.</p> <ul style="list-style-type: none"> • Change ICA billing tables where appropriate • Issue credits where appropriate <p>SBC will report when process improvements are complete.</p>	<ul style="list-style-type: none"> • Billing table reviews and changes have been completed for all active CLECs purchasing UNE-P in Illinois. A total of 129 CLECs rate tables were reviewed and, where applicable, updated. <p>This commitment is completed.</p> <ul style="list-style-type: none"> • The process of issuing credits to impacted CLECs is well underway and, for several large CLECs, has been completed. SBC Illinois expects to complete this process for all CLECs by August 2003 in those situations where credits are automatically applied. In those cases where negotiations have been initiated between the parties related to this matter, actual bill credit dates may vary. • SBC Illinois has issued the credits in those situations where credits are automatically applied. <p>This commitment on schedule.</p>
10	UNE-P Billing Accuracy	<p>SBC commits to implement 5-step program to improve its contract management program:</p> <ul style="list-style-type: none"> • SBC will offer CLECs a contract amendment tying ICA UNE-P rates to tariffed rates. 	<ul style="list-style-type: none"> • SBC Illinois issued Accessible Letter CLECAM03-135 on April 18, 2003, which announced the introduction of an interconnection agreement amendment to provide for tariff-based pricing for the component UNEs that comprise the UNE-P. The amendment can be

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		<ul style="list-style-type: none"> SBC will ask CLECs to amend old contracts to include current UNE products and services. 	<p>found at the following URL: https://clec.sbc.com/clec_documents/unrestr/interconnect/multi/TariffRateAmd041603.doc Two CLECs have requested the amendment. As of June 27, 2003, two CLECs have requested the amendment and no CLECs have executed the amendment. See Attachment 9.</p> <p>This commitment is completed.</p> <ul style="list-style-type: none"> SBC Illinois has identified more than 60 CLECs that are ordering UNE-P under tariff rather than under the terms of their interconnection agreement. SBC Illinois has developed a project plan to contact these CLECs with a proposal to update the CLECs' interconnection agreements so that the most up-to-date UNE-P terms and prices are included in the interconnection agreement. Progress on this initiative will be provided in subsequent bi-monthly reports to the ICC. Additional review of these 60 CLECs revealed that only 13 of the CLECs required updated agreements. The other CLECs do not require updates to their interconnection agreements, primarily because the agreements already provide for the purchase of UNE-P, the CLEC is not a UNE-P provider (i.e. CLEC is only providing xDSL service), or the CLEC is out of business. Of the 13 CLECs, two CLECs are in the process of completing negotiations for a successor interconnection agreement in Illinois. Letters were sent out to the remaining 11 CLECs on August 8, 2003, requesting that the CLECs update their interconnection agreement to include current UNE-P pricing. Account Managers are pursuing follow-up activities with the remaining CLECs.

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		<ul style="list-style-type: none"> SBC will amend its UNE-P tariffs that allow CLECs with ICAs to take service from the tariff to require written notice from the CLEC. SBC will use a multi-functional approach to determine the impact of future ICC TELRIC orders on existing ICAs. SBC will issue revised M&P to service center personnel to clarify the application of UNE-P non-recurring charges when orders are processed manually. 	<p>This commitment is on schedule.</p> <ul style="list-style-type: none"> SBC Illinois filed a tariff to fulfill this commitment on June 6, 2003. The tariff will become effective on July 22, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 1, Sheet 2.1; Section 15, Sheet 5; Section 20, Sheets 3 and 3.1; and Section 21, Sheets 1 and 1.1. See Attachment 10. <p>This commitment is completed.</p> <ul style="list-style-type: none"> In May 2003, SBC updated a regulatory order distribution process in which information regarding final orders that may impact SBC's relationships with CLECs is summarized and distributed within the Company. The process uses a multi-functional approach by enlisting the assistance of personnel from the Regulatory, Legal, Network and Industry Markets organizations and specifically including Contract Management. Contract Management has formed a new work group to focus on implementation of such orders as they impact SBC's existing contract obligations. <p>This commitment is completed.</p> <ul style="list-style-type: none"> Effective May 15, 2003 SBC made the following changes to the methods and procedures ("M&Ps") used by its service center personnel: <ol style="list-style-type: none"> Created a chart to show the NRCs that apply in different UNE-P scenarios; Added several new examples of ordering scenarios that the service center personnel may encounter, together with exhibits showing sample orders for migrations, adding lines, various hunting arrangements, telephone number changes, listing

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		<ul style="list-style-type: none"> SBC will file bi-monthly reports detailing steps taken by the Company and CLECs to clarify billing issues. 	<p>changes, etc.;</p> <p>3. Updated the state-specific NRC charts to reflect the most current rate elements;</p> <p>4. Existing exhibits were revised to make them more understandable, e.g., by adding references to specific states and specific scenarios.</p> <p>This commitment is completed.</p> <ul style="list-style-type: none"> This is the first bi-monthly report. This is the second of the bi-monthly progress reports required by this commitment item. The first report was filed on June 30, 2003. <p>Overall, the commitment for Item 10 is on schedule.</p>
11	Bearing Point Re-Testing	SBC commits to implement corrective action for BearingPoint issues TVV 1-28 (timeliness of service order completion responses); TVV 4-27 (accuracy of updates to customer service records); and TVV 7-14 (accuracy of close out coding on end-to-end trouble faults). SBC commits to address any remaining operational deficiencies by July 31, 2003 and to use full and good faith efforts to have these items successfully re-tested by an independent third-party tester by November, 2003. The Company will report to the Commission on the status	<p>SBC Illinois continues to work with BearingPoint to validate the corrective actions that have been or are being taken. On June 16, 2003, SBC Illinois filed status reports on TVV 4-27 (CSI Accuracy) and TVV 7-14 (Special Circuit Repair Coding) in Docket 01-0662 and served the parties of record. SBC Illinois will file the first status report on TVV 1-28 (Service Order Completion Timeliness) on July 15, 2003.</p> <p>On July 15, SBC Illinois filed a status report on TVV 1-28 (Service Order Completion Timeliness).</p> <p>On August 15, 2003, SBC Illinois filed status reports on TVV 4-27 (CSI Accuracy) and TVV 7-14 (Special Circuit Repair Coding).</p>

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		of re-testing at that time. Thereafter, the Commission can determine the appropriate next steps.	This commitment is on schedule.
12	Customer Service Inquiry Accuracy Plan	<p>SBC commits to file an Illinois-specific Customer Service Inquiry Accuracy Plan that mirrors the plan filed in Michigan.</p> <p>This is the same issue as TVV 4-27 referenced above.</p>	<p>On May 1, 2003, SBC Illinois filed with the Commission and served the parties in Docket 01-0662 the Customer Service Inquiry Accuracy Plan. Status reports, as required by the Plan, will be filed on a bi-monthly basis. The first report was filed on June 16, 2003.</p> <p>This commitment is completed. Reports will continue to be filed under the terms of the Plan.</p>
13	Repair Coding Accuracy Plan	<p>SBC commits to file an Illinois-specific Special Circuit Repair Coding Accuracy Plan that mirrors the plan filed in Michigan. This includes items 2 and 3 recommended by McLeod and TDS – and some (but not all) of item 1. Note that this commitment does not apply to UNE Repair Coding Accuracy, because SBC Illinois successfully passed BearingPoint's evaluation on this point.</p> <p>This is the same issue as TVV7-14 referenced above.</p>	<p>On May 1, 2003, SBC Illinois filed with the Commission the Special Circuit Repair Coding Accuracy Plan and served it on the parties in Docket 01-0662. Status reports, as required by the Plan, will be filed on a bi-monthly basis. The first report was filed on June 16, 2003.</p> <p>This commitment is completed. Reports will continue to be filed under the terms of the Plan.</p>
14	Directory Listing and Directory Assistance Database	SBC will implement the plan on a Midwest regional basis and will provide the Commission with periodic reports of the regional results associated with this plan.	On May 1, 2003, SBC Illinois filed with the Commission the Directory Listing and Directory Assistance Database Update Accuracy Plan and served it on the parties in Docket 01-0662. Reports, as required by the Plan, will be filed on a bi-monthly basis. The first bi-monthly report was filed on June 16, 2003.

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	Update Accuracy Plan	associated with this plan.	was filed on June 16, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
15	Billing Auditability and Dispute Resolution	SBC commits to file an Illinois-specific Billing Auditability and Dispute Resolution Plan that mirrors the plan filed in Michigan. SBC will receive input on this subject in the Midwest CLEC User Forum.	On May 1, 2003, SBC Illinois filed the Billing Auditability and Dispute Resolution Plan with the Commission and served it on the parties of record in Docket 01-0662. Reports, as required by the Plan, will be filed on a quarterly basis beginning in July 2003. As a result of the input received at the forum, a CLEC Billing subcommittee was established to identify, track and resolve CLEC billing issues. The committee has regular participation of over a dozen CLECs. And as of the committee's June 12, 2003 meeting, fifty-six billing issues had been raised, twenty of which had been resolved, and progress is being made to resolve the remaining issues. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
16	Line Loss Notifier Communications	SBC commits to file an Illinois-specific Line Loss Notifier Communication Plan that mirrors that plan filed in Michigan and commits to provide the Commission with the monthly Line Loss Notifier issues report described in that plan.	On May 1, 2003, SBC Illinois filed the Line Loss Notifier Communications Plan with the Commission and served it on the parties of record in Docket 01-0662. SBC Illinois filed reports on April and May activity, as described in the Plan, on June 2, 2003 and June 10, 2003 respectively. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
17	Change Management Communications	SBC commits to file an Illinois-specific Change Management Communications Plan and to provide	On May 1, 2003, SBC Illinois filed the Change Management Communication Plan with the Commission and served it on the parties of record in Docket 01-0662. The first quarterly progress report, as

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	on	the Commission with quarterly progress reports for one (1) year beginning April 30, 2003.	required by the Plan, was filed on June 2, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
18	Pre-Order Processing Timeliness Plan	SBC will implement the plan on a Midwest regional basis and will provide the Commission with a report in July 2003 (quarterly thereafter, if needed) of the regional results associated with this plan.	On May 1, 2003, SBC Illinois filed the Pre-Order Processing Timeliness Plan with the Commission and served it on the parties of record in Docket 01-0662. A status report, as required by the Plan, will be filed in July 2003. The upgrade of the commercial EDI translator planned for June 28, 2003 was delayed and will be re-scheduled in the near future. This issue will be discussed in the status report due July 31, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
19	BearingPoint Re-testing	SBC to implement corrective actions for TVV 1-4 (Order functionality) and PPR 13-4 (billing products process – error checking). SBC commits to address these issues and to use full and good faith efforts to have these items re-tested by BearingPoint by August, 2003.	These observations and exceptions have been corrected by SBC Illinois and closed successfully by BearingPoint. TVV1-4 was satisfied effective with the closing of observation 666 on April 15, 2003. PPR 13-4 was satisfied with the closing of exception 119 on March 18, 2003. This commitment is completed.
20	Billing Timeliness	SBC will take steps to correct unsatisfactory performance with respect to PM 17-billing timeliness and will subject it to additional monitoring, as set out in Jim Ehr's Surebuttal affidavit.	SBC Illinois provided Staff information on PM 17 in reports dated April 2, May 2 and June 4, 2003 as proposed in Jim Ehr's Surrebuttal affidavit. See Attachments 11, 12 and 13. For April and May 2003, results for PM 17 demonstrated performance in parity with SBC Illinois retail or affiliate for seven of the eight

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		Surebuttal affidavit.	<p>submeasures. UNE, UNE-P and Lineshare submeasures have been in parity for both months.</p> <p>SBC Illinois provided Staff information on PM 17 in reports dated July 8 and August 6, 2003. The UNE, UNE-P and Lineshare submeasures continue to meet the parity standard. The Resale submeasure is the only submeasure that has not been in parity for both months. SBC Illinois continues to address performance on the Resale submeasure in the monthly “Key PMs” report to ICC Staff. See Attachments 1 and 2.</p> <p>This commitment is on schedule.</p>
21	Line Loss	SBC to correct the loss notification issue with partial migration of accounts.	<p>Software changes associated with partial migrations were completed by June 5, 2002. A further fix was made on March 7, 2003. Accessible Letters CLECAMS03-019 and CLECAMS03-021 distributed March 6, 2003 and March 14, 2003 informed CLECs of the issue. See Attachments 14 and 15.</p> <p>This commitment is completed.</p>
22	Line Loss	SBC to retrain its personnel to prevent loss notification problems arising from manual handling errors in local service centers.	<p>SBC Illinois developed a formal training package for service representatives on the line loss notification process. This four-hour training package was delivered to over 1000 service representatives beginning the week of May 26, 2002 and completing on July 31, 2002.</p> <p>This commitment is completed.</p>
23	Line Loss	SBC to determine if other situations exist that cause line loss notifications to be inaccurate or untimely, and correct those situations immediately.	<p>SBC Illinois has an on-going process through which it monitors and corrects any such situations that may arise.</p> <p>This commitment is completed.</p>

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24	Line Loss	SBC to clearly state all the problems it has uncovered relating to loss notifications since January 2001 and to communicate those in an Accessible Letter. The Accessible Letter should indicate when the problem was first identified, what software versions it lies to, what action SBC has taken to correct each issue and when the action was taken, any plan or future action SBC plans to take, and an estimate of when the action will be taken.	<p>Accessible Letter CLECAM02-400 was distributed on September 24, 2002. This Accessible Letter included problem start and end dates, the scope of the problem, the corrective action taken and the timing of that action. See Attachment 16.</p> <p>In addition, Accessible Letters CLECAMS02-122, CLECAMS02-123, CLECAMS03-019, CLECAMS03-021 and CLECAMS03-035 were distributed on November 12 and November 13, 2002 and March 6, March 14 and May 21, 2003 respectively. These letters were the initial notification and follow-up related to line loss incidences after the September Accessible Letter was distributed. See Attachments 17, 18, 14, 15 and 19.</p> <p>This commitment is completed. Any future issues will be reported consistent with the Line Loss Notifier Plan.</p> <p>This commitment is completed.</p>
25	Line Loss	On a CLEC by CLEC basis, SBC to determine the accounts for which loss notifications have never been sent or incorrectly sent and will communicate these instances to the affected CLECs. If issues persist, such reconciliation will be done on a monthly basis until all issues have been resolved.	<p>SBC Illinois has engaged in account reconciliation with individual CLECs in order to accommodate the business objectives and system capabilities of each CLEC. This has included activities such as resending line loss notifications for past periods, and providing reports of end user account status for comparison with the CLEC's customer database. Information regarding some of the reconciliation activities may be found in Accessible Letters CLECAM02-170 and CLECAM02-209. See Attachments 20 and 21.</p> <p>This commitment is completed.</p>
26	Line Loss	SBC commits to continue meeting with CLECs on an as needed basis to discuss the problems associated with	SBC Illinois held an initial Line Loss Notification Workshop for interested CLECs on March 13-14, 2002. Follow-up calls were held on April 30, May 17, May 30, and June 28, 2002. In addition, SBC

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	Topic	Description of Commitment	Status
		loss notifications and the actions that SBC has taken to address them.	discusses LLN issues with CLECs as appropriate during regular monthly OSS Change Management (“CMP”) meetings and CLEC Users Forums. This commitment is completed.
27	Line Loss	SBC commits to modify the process to notify its retail organization of a customer loss or to modify the process SBC uses to notify its wholesale carriers of a customer loss to bring them into parity with one another.	SBC Illinois’ retail operations rely exclusively on the same Line Loss Notifications as those sent to CLECs pursuant to the Commission’s Order in Docket 02-0160. This commitment is completed.
28	Line Loss	SBC will make line loss performance measure MI 13 a remedied performance measure. If tiers are applicable to the performance remedy plan then the measure will have a medium weight for both tier 1 and tier 2 payments or comparable remedy level	Performance measure MI 13 is a remedied performance measure. Under the new Illinois 271 Remedy Plan, the low, medium and high weighting has been eliminated. This commitment is completed.
29	Line Loss	SBC Illinois will implement all changes to performance measures MI 13 and MI 13.1 agreed upon in the last performance measurement six month review session including the clarification that all line loss notices generated due to SBC Illinois winback scenarios are included in the MI 13 and MI 13.1 performance	Changes to the business rules were implemented effective with March 2003 results reported April 21, 2003. This commitment is completed.

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	Topic	Description of Commitment	Status
		measurements;	
30	Line Loss	SBC Illinois will file revised tariff pages with the Commission for the changes it will make to performance measure MI 13 and MI 13.1 based upon this Order and the Company's commitments in this order, such that the effective date of the tariff will coincide with the implementation date of the performance measurement changes	<p>SBC Illinois filed a tariff to fulfill this commitment on June 2, 2003. The tariff will become effective on July 17, 2003. The modified language is located in Ill. C.C. 20, Part 12, Section 11, Sheets 359, 359.1, 359.2, 359.3 and 412. See Attachment 22.</p> <p>This commitment is completed.</p>
31	Line Loss	SBC Illinois will closely monitor the line loss notifications it provides to CLECs until such time as SBC Illinois provides a full six months of line loss notifications without any new problems being uncovered and without any of the existing or prior problems having resurfaced.	<p>The SBC Illinois line loss notification cross-functional team continues to monitor the loss notification process on a daily basis. The cross-functional team will be maintained at least until June 30, 2003. SBC will evaluate the need for continuation at the end of the ICC's required reporting period and provide the ICC with a 30-day notice of any discontinuance. SBC Illinois is providing the Commission a monthly report of any line loss issues that were identified during the month as described in the Line Loss Notifier Communications Plan. See commitment 16.</p> <p>The LSC continues daily monitoring of line loss notification activities. Any issues identified are provided to the cross- functional team that continues to meet to respond/resolve issues on an as needed basis.</p> <p>This commitment is on schedule.</p>

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	Topic	Description of Commitment	Status
32	Line Splitting	SBC commits to file tariff language that would establish a degree of comparability between the Company's provisioning of the UNEs necessary to support a line splitting arrangement and the Company's provisioning of HFPL for line sharing.	SBC Illinois filed a tariff to fulfill this commitment on June 5, 2003. The tariff became effective on June 6, 2003. The modified language is located in Ill. C.C. Tariff 20, Part 19, Section 2, Sheet 3.1 on June 5, 2003. See Attachment 23. This commitment is completed.
33	Performance Improvement	SBC commits to use its good faith, best efforts to remedy unsatisfactory performance on PMs 7.1, 13, 17, MI-2, MI-14, and 37-4, in accordance with the Order.	See Attachment 24. See Attachment 3. This commitment is on schedule.
34	Performance Improvement	SBC commits to use its good faith, best efforts to remedy performance on PMs C WI-6-02, 59-03, 65-03, 65.1-03, 67-03, 67-18 and 66-03, in accordance with the order.	See Attachment 25. See Attachment 4. This commitment is on schedule.
35	Performance Improvement	SBC Commits to keep monitoring the situation with respect to PM 55, in accordance with the terms of the Order.	SBC Illinois continues to monitor PM 55 and has provided monthly reports to Staff on April 2, May 2 and June 4, 2003. In its April report, SBC Illinois demonstrates that SBC has met the standard for PM 55.01.3 for two months and thus this PM will not be subject to further monitoring. SBC Illinois has implemented an Enhancement Request (ER) which includes in this measure only those orders with requested due dates of the standard interval for wholesale orders and the offered interval on SBC Illinois retail orders. With this enhancement, SBC Illinois met the standard for PM 55.01.1 in April. See Attachments 11,

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	Topic	Description of Commitment	Status
			<p>12 and 13.</p> <p>SBC Illinois provided monthly reports to Staff on July 8 and August 6, 2003. See Attachments 1 and 2. In its July report, SBC Illinois demonstrates that it has met the standard for PM 55.01.1 for two months and thus this PM will not be subject to further reporting to ICC staff in the monthly “Key PMs” report. Monitoring for PM 55, as for all PMs continues on a normal operational basis.</p> <p>This commitment is completed.</p>
36	RCF	SBC will make RCF available to CLECs as a resale offering and will work with Z-Tel to facilitate the availability of RCF as part of a UNE-P offering.	<p>On June 18, 2003, SBC Illinois issued Accessible Letter CLECAM03-209 which provides information for CLECs that are interested in providing a resale-based Remote Call Forwarding (RCF) Service to CLEC end-users that are provided their local service under a UNE-P arrangement. SBC Illinois continues to work to facilitate the availability of RCF as part of a UNE-P offering. See Attachment 26.</p> <p>As of this report, one CLEC has executed the amendment.</p> <p>This commitment is open.</p>
37	911 (PM 104)	SBC commits to pursue and explore with Staff and CLECs a more reasonable and workable standard for PM 104.	<p>SBC Illinois will propose a performance measure for PM 104 at the next six month review collaborative. The next collaborative is expected to begin in August 2003.</p> <p>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</p> <p>This commitment is on schedule.</p>

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	Topic	Description of Commitment	Status
38	PM 37-01	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	<p>SBC Illinois has provided reports to Staff on April 2, May 2 and June 4, 2003 regarding PM 37-01 and will continue to do so until it meets the performance standard for two consecutive months. See Attachments 11, 12 and 13.</p> <p>SBC Illinois provided reports to Staff on July 8 and August 6, 2003. See Attachments 1 and 2. For June results reported in July, SBC Illinois met the standard for PM 37-01.</p> <p>This commitment is on schedule.</p>
39	PM 37-04	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	<p>The first report was provided to Staff on April 2, 2003. As the results show that SBC has now met the standard for two months, this PM will not be subject to further reporting. See Attachment 11.</p> <p>This commitment is completed.</p>
40	Remedy Plan	SBC to send CLECs an Accessible Letter advising CLECs of the adoption of the Section 271 Plan.	<p>Accessible Letter CLECAM03-188 informing CLECs of the new Section 271 Plan was distributed on May 27, 2003. See Attachment 27.</p> <p>This commitment is completed.</p>
41	Remedy Plan	SBC will modify the Compromise Remedy Plan to incorporate changes to the periodic audit provision.	<p>SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding.</p> <p>This commitment is completed.</p>
42	Remedy Plan	SBC will modify the Compromise Remedy Plan to incorporate “mini-audit” language of the 01-0120 plan.	<p>SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding.</p>

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	Topic	Description of Commitment	Status
			This commitment is completed.
43	Remedy Plan	SBC will modify the Compromise Remedy Plan to include the “sign-up” and “exclusions” language of the 01-0120 plan.	SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding. This commitment is completed.
44	Remedy Plan	SBC will modify the Compromise Remedy Plan to delete a termination date. A future collaborative will investigate the term of the plan.	SBC Illinois revised the Compromise Remedy Plan on May 2, 2003 and filed it pursuant to the PEPO in this proceeding. This commitment is completed.
45	Remedy Plan	SBC will modify its tariff to comply with the order, will provide CLECs the opportunity to opt-in to the plan approved in this proceeding, and will incorporate the required opt-in language into its Compromise Remedy Plan	SBC Illinois filed a tariff to fulfill this commitment on June 4, 2003. The tariff became effective on June 5, 2003. The modified language is located in Ill. C.C. 20, Part 2, Section 11, Sheets 4, 4.1-4.37, 5-14, 14.1, 14.2, 15-17, 17.1, 18-31, 393 and 394. SBC Illinois revised the Compromise Remedy Plan to incorporate the required opt-in language on May 2, 2003 and filed it pursuant to the PEPO in this proceeding. See Attachment 28. This commitment is completed.
46	Remedy Plan	SBC to participate in six month collaborative process as specified in the order	The next six month review is expected to begin in August 2003. The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003. This commitment is on schedule.

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	Topic	Description of Commitment	Status
47	PMs	SBC agreed to revise its PM tariff to add submeasures specific to EELs.	<p>SBC Illinois filed a tariff to fulfill this commitment on February 7, 2003. The tariff became effective on March 24, 2003. The modified language is located in Ill. C.C. 20, Part 2, Section 11, Sheets 209, 210.1, 221, 222.1, 228, 229, 231, 232, 234, 235, 237, 238, 240, 241, 243, 244, 249, 250, 252, 253, 257, 259, 262 and 263. See Attachment 29.</p> <p>This commitment is completed.</p>
48	PMs	SBC shall add a diagnostic measure that will assess the duration of the EEL certification process. Final Order, page 216.	<p>SBC Illinois will propose a diagnostic performance measure that will assess the duration of the EEL certification process at the next six month review collaborative. The next collaborative is expected to begin in August 2003.</p> <p>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</p> <p>This commitment is on schedule.</p>
49	BearingPoint testing	SBC to address deficiencies noted by BearingPoint. BearingPoint to issue status report by November 28, 2003. SBC to respond to any open items, and the Commission to determine the appropriate resolution.	<p>SBC Illinois continues to work with BearingPoint to address deficiencies.</p> <p>This commitment is on schedule.</p>
50	All Equipment List	SBC will continue to update the list as needed.	SBC Illinois posts and maintains on its website a list of safety-compliant equipment known as the Illinois Safety Compliance Equipment List ("ISCEL"). SBC Illinois has implemented procedures to ensure timely quarterly updates to the ISCEL. The list can be found at the following

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	Topic	Description of Commitment	Status
			<p>URL: https://clec.sbc.com/clec_documents/unrestr/hb/13%20State/242/apdx/MW/Illinois_Safety_Compliant_Equipment_List_(ISCEL).pdf The list was updated on March 28, 2003. Estimated completion date for the next quarterly update is July 10, 2003.</p> <p>This commitment is completed. Updates will continue to be provided on a quarterly basis.</p>
51	Power Cabling	SBC will allow CLECs to opt into the provision for power cabling in the McLeod agreement	<p>SBC Illinois acknowledged its obligation on the record in Docket 01-0662 to permit CLECs to opt into the provision for power cabling in the McLeod agreement. SBC Illinois' Industry Markets organization is fully aware of this obligation and is ready to handle any such requests pursuant to the opt-in policies posted on the CLEC Online website.</p> <p>This commitment is completed.</p>
52	E&Y Exceptions	SBC will provide periodic reports to Staff as to the status of E&Y exceptions, in a manner and time concurrent with its present reporting to the Michigan Commission	<p>The final E&Y report was filed with the Commission on June 4, 2003.</p> <p>This commitment is completed.</p>
53	BearingPoint PM review	SBC will address the deficiencies raised by BearingPoint in the metrics review and will use best and good faith efforts to facilitate the completion of testing by November 28, 2003. Thereafter, the Commission can determine the appropriate next steps.	<p>SBC Illinois continues to work with BearingPoint on the metrics review. The Performance Metrics Project Plan released June 2, 2003 indicates that approximately 53% or 143 of the 270 applicable evaluation criteria have been satisfied.</p> <p>This commitment is completed.</p>

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	Topic	Description of Commitment	Status
54		SBC commits to complete any and all remedial actions the Commission deemed necessary to achieve compliance with the Commission's Phase I Interim Order.	This commitment is summary in nature and simply refers to the specific commitment items listed above. SBC Illinois has completed or is on schedule to complete all of these items. This commitment is on schedule.
55		SBC commits to exercising its best efforts to remedy each OSS and performance measurement deficiency that remains unresolved in accord with this order. These actions will further be verified by an independent third party.	This commitment is summary and nature and simply refers to the specific commitment items listed above. See commitments 11, 12, 13, 33, 34, 35, 49, and 53. This commitment is on schedule.
56		SBC commits to report to the Commission bi-monthly on progress toward meeting all remaining requirements, an obligation commencing with the issuance of this Final Order and continuing through completion of all required activity.	This is the first of the bi-monthly progress reports required by this commitment item. This is the second of the bi-monthly progress reports required by this commitment item. The first report was filed on June 30, 2003. This commitment is on schedule.
57		SBC commits to participate in a collaborative composed of Staff, the Company and all interested parties to facilitate and monitor its progress toward eliminating the deficiencies indicated in the review of the 3-month PM data results.	SBC Illinois will conduct this collaborative as an adjunct to the six-month review PM collaborative expected to begin in August 2003. The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.

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	Topic	Description of Commitment	Status
			This commitment is on schedule.

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	Topic	Description of Commitment	Status
1	Opt-In Policies	SBC commits to post to its CLEC website language that generally sets forth its MFN obligations under Section 252(i) and its policies regarding the incorporation of tariffs by reference into ICAs.	On April 9, 2003, SBC Illinois posted language to the CLEC Online website that summarizes SBC's 13-State General "MFN" Policy, the Illinois-specific In and Out-of-Region Porting Requirement, and SBC Illinois' policy regarding the incorporation of tariffs by reference into interconnection agreements. This information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/interconnect/multi/SBC_13-State_MFN_Policy.pdf See Attachment 1. This commitment is completed.
2	UNE Rate Clarity	SBC commits to file tariff language clarifying the application of entrance facility and connection charges to EELs.	SBC Illinois filed a tariff to fulfill this commitment on April 3, 2003. The tariff became effective on May 19, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 20, Sheets 3 and 4. See Attachment 2. This commitment is completed.
3	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for various UNE-P scenarios.	On March 20, 2003, SBC Illinois posted to the CLEC Online website a matrix detailing the application of rates for the specified UNE-P scenarios. The information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/hb/amer/1706/IL%20Rate%20Application%20Guide%20for%20UNE-P.xls See Attachment 3. This commitment is completed.
4	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for EEL scenarios.	On March 25, 2003, SBC Illinois posted to the CLEC Online website a matrix detailing the application of rates for the specified EEL scenarios. The information can be accessed at the following URL: https://clec.sbc.com/clec_documents/unrestr/hb/amer/1719/IL%20Rate%20Application%20Guide%20for%20Enhanced%20Extended%20Loo

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	Topic	Description of Commitment	Status
			p.pdf See Attachment 4. This commitment is completed.
5	TELRIC Compliant UNE Rates	SBC commits to lower subloop rates to levels proposed in Wardin Affidavit.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 16, Sheets 10, 12 and 16. See Attachment 5. This commitment is completed.
6	TELRIC Compliant UNE Rates	SBC commits to lower two line connection subloop NRCs to California level.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 16, Sheet 14. See Attachment 6. This commitment is completed.
7	TELRIC Compliant UNE Rates	SBC commits to lower CNAM query rate to Michigan rate of \$.007932.	SBC Illinois filed a tariff to fulfill this commitment on May 16, 2003. The tariff became effective on May 17, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 17, Sheet 2. See Attachment 7. This commitment is completed.
8	TELRIC Compliant UNE Rates	SBC commits to file true-up language in tariff for identified “interim” UNE rates.	SBC Illinois filed tariffs to fulfill this commitment on February 28, 2003 and March 17, 2003. The tariffs became effective on March 1, 2003 and March 18, 2003. The modified language is located in the following tariffs: Ill. C.C. Tariff 20, Part 19, Section 2, Sheet 32; Section 3, Sheet 40; Section 16, Sheets 10 through 16; Section 17, Sheet 2; Section 18, Sheets 8 and 9; and Section 20, Sheets 4 through 6. See Attachment 8.

	Topic	Description of Commitment	Status
			This commitment is completed.
9	UNE-P Billing Accuracy	<p>SBC commits to correct ICA billing errors associated with UNE-P billing.</p> <ul style="list-style-type: none"> • Change ICA billing tables where appropriate • Issue credits where appropriate <p>SBC will report when process improvements are complete.</p>	<ul style="list-style-type: none"> • Billing table reviews and changes have been completed for all active CLECs purchasing UNE-P in Illinois. A total of 129 CLECs rate tables were reviewed and, where applicable, updated. <p>This commitment is completed.</p> <ul style="list-style-type: none"> • The process of issuing credits to impacted CLECs is well underway and, for several large CLECs, has been completed. SBC Illinois expects to complete this process for all CLECs by August 2003 in those situations where credits are automatically applied. In those cases where negotiations have been initiated between the parties related to this matter, actual bill credit dates may vary. • <u>SBC Illinois has issued the credits in those situations where credits are automatically applied.</u> <p>This commitment on schedule.</p>
10	UNE-P Billing Accuracy	<p>SBC commits to implement 5-step program to improve its contract management program:</p> <ul style="list-style-type: none"> • SBC will offer CLECs a contract amendment tying ICA UNE-P rates to tariffed rates. 	<ul style="list-style-type: none"> • SBC Illinois issued Accessible Letter CLECAM03-135 on April 18, 2003, which announced the introduction of an interconnection agreement amendment to provide for tariff-based pricing for the component UNEs that comprise the UNE-P. The amendment can be

	Topic	Description of Commitment	Status
		<ul style="list-style-type: none"> SBC will ask CLECs to amend old contracts to include current UNE products and services. 	<p>found at the following URL: https://clec.sbc.com/clec_documents/unrestr/interconnect/multi/TariffRateAmd041603.doc Two CLECs have requested the amendment. As of June 27, 2003, two CLECs have requested the amendment and no CLECs have executed the amendment. See Attachment 9.</p> <p>This commitment is completed.</p> <ul style="list-style-type: none"> SBC Illinois has identified more than 60 CLECs that are ordering UNE-P under tariff rather than under the terms of their interconnection agreement. SBC Illinois has developed a project plan to contact these CLECs with a proposal to update the CLECs' interconnection agreements so that the most up-to-date UNE-P terms and prices are included in the interconnection agreement. Progress on this initiative will be provided in subsequent bi-monthly reports to the ICC. <u>Additional review of these 60 CLECs revealed that only 13 of the CLECs required updated agreements. The other CLECs do not require updates to their interconnection agreements, primarily because the agreements already provide for the purchase of UNE-P, the CLEC is not a UNE-P provider (i.e. CLEC is only providing xDSL service), or the CLEC is out of business. Of the 13 CLECs, two CLECs are in the process of completing negotiations for a successor interconnection agreement in Illinois. Letters were sent out to the remaining 11 CLECs on August 8, 2003, requesting that the CLECs update their interconnection agreement to include current UNE-P pricing. Account Managers are pursuing follow-up activities with the remaining CLECs.</u>

	Topic	Description of Commitment	Status
		<ul style="list-style-type: none"> SBC will amend its UNE-P tariffs that allow CLECs with ICAs to take service from the tariff to require written notice from the CLEC. SBC will use a multi-functional approach to determine the impact of future ICC TELRIC orders on existing ICAs. SBC will issue revised M&P to service center personnel to clarify the application of UNE-P non-recurring charges when orders are processed manually. 	<p>This commitment is on schedule.</p> <ul style="list-style-type: none"> SBC Illinois filed a tariff to fulfill this commitment on June 6, 2003. The tariff will become effective on July 22, 2003. The modified language is located in Ill. C.C. 20, Part 19, Section 1, Sheet 2.1; Section 15, Sheet 5; Section 20, Sheets 3 and 3.1; and Section 21, Sheets 1 and 1.1. See Attachment 10. <p>This commitment is completed.</p> <ul style="list-style-type: none"> In May 2003, SBC updated a regulatory order distribution process in which information regarding final orders that may impact SBC's relationships with CLECs is summarized and distributed within the Company. The process uses a multi-functional approach by enlisting the assistance of personnel from the Regulatory, Legal, Network and Industry Markets organizations and specifically including Contract Management. Contract Management has formed a new work group to focus on implementation of such orders as they impact SBC's existing contract obligations. <p>This commitment is completed.</p> <ul style="list-style-type: none"> Effective May 15, 2003 SBC made the following changes to the methods and procedures ("M&Ps") used by its service center personnel: <ol style="list-style-type: none"> Created a chart to show the NRCs that apply in different UNE-P scenarios; Added several new examples of ordering scenarios that the service center personnel may encounter, together with exhibits showing sample orders for migrations, adding lines, various hunting arrangements, telephone number changes, listing

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	Topic	Description of Commitment	Status
		<ul style="list-style-type: none"> SBC will file bi-monthly reports detailing steps taken by the Company and CLECs to clarify billing issues. 	<p>changes, etc.;</p> <ol style="list-style-type: none"> Updated the state-specific NRC charts to reflect the most current rate elements; Existing exhibits were revised to make them more understandable, e.g., by adding references to specific states and specific scenarios. <p>This commitment is completed.</p> <ul style="list-style-type: none"> This is the first bi-monthly report. <u>This is the second of the bi-monthly progress reports required by this commitment item. The first report was filed on June 30, 2003.</u> <p>Overall, the commitment for Item 10 is on schedule.</p>
11	Bearing Point Re-Testing	SBC commits to implement corrective action for BearingPoint issues TVV 1-28 (timeliness of service order completion responses); TVV 4-27 (accuracy of updates to customer service records); and TVV 7-14 (accuracy of close out coding on end-to-end trouble faults). SBC commits to address any remaining operational deficiencies by July 31, 2003 and to use full and good faith efforts to have these items successfully re-tested by an independent third-party tester by	<p>SBC Illinois continues to work with BearingPoint to validate the corrective actions that have been or are being taken. On June 16, 2003, SBC Illinois filed status reports on TVV 4-27 (CSI Accuracy) and TVV 7-14 (Special Circuit Repair Coding) in Docket 01-0662 and served the parties of record. SBC Illinois will file the first status report on TVV 1-28 (Service Order Completion Timeliness) on July 15, 2003.</p> <p><u>On July 15, SBC Illinois filed a status report on TVV 1-28 (Service Order Completion Timeliness).</u></p> <p><u>On August 15, 2003, SBC Illinois filed status reports on TVV 4-27 (CSI Accuracy and TVV 7-14 (Special Circuit Repair Coding).</u></p>

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	Topic	Description of Commitment	Status
		November, 2003. The Company will report to the Commission on the status of re-testing at that time. Thereafter, the Commission can determine the appropriate next steps.	This commitment is on schedule.
12	Customer Service Inquiry Accuracy Plan	<p>SBC commits to file an Illinois-specific Customer Service Inquiry Accuracy Plan that mirrors the plan filed in Michigan.</p> <p>This is the same issue as TVV 4-27 referenced above.</p>	<p>On May 1, 2003, SBC Illinois filed with the Commission and served the parties in Docket 01-0662 the Customer Service Inquiry Accuracy Plan. Status reports, as required by the Plan, will be filed on a bi-monthly basis. The first report was filed on June 16, 2003.</p> <p>This commitment is completed. Reports will continue to be filed under the terms of the Plan.</p>
13	Repair Coding Accuracy Plan	<p>SBC commits to file an Illinois-specific Special Circuit Repair Coding Accuracy Plan that mirrors the plan filed in Michigan. This includes items 2 and 3 recommended by McLeod and TDS – and some (but not all) of item 1. Note that this commitment does not apply to UNE Repair Coding Accuracy, because SBC Illinois successfully passed BearingPoint's evaluation on this point.</p> <p>This is the same issue as TVV7-14 referenced above.</p>	<p>On May 1, 2003, SBC Illinois filed with the Commission the Special Circuit Repair Coding Accuracy Plan and served it on the parties in Docket 01-0662. Status reports, as required by the Plan, will be filed on a bi-monthly basis. The first report was filed on June 16, 2003.</p> <p>This commitment is completed. Reports will continue to be filed under the terms of the Plan.</p>
14	Directory Listing and Directory	SBC will implement the plan on a Midwest regional basis and will provide the Commission with periodic	On May 1, 2003, SBC Illinois filed with the Commission the Directory Listing and Directory Assistance Database Update Accuracy Plan and served it on the parties in Docket 01-0662. Reports, as required by the

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	Topic	Description of Commitment	Status
	Assistance Database Update Accuracy Plan	reports of the regional results associated with this plan.	Plan, will be filed on a bi-monthly basis. The first bi-monthly report was filed on June 16, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
15	Billing Auditability and Dispute Resolution	SBC commits to file an Illinois-specific Billing Auditability and Dispute Resolution Plan that mirrors the plan filed in Michigan. SBC will receive input on this subject in the Midwest CLEC User Forum.	On May 1, 2003, SBC Illinois filed the Billing Auditability and Dispute Resolution Plan with the Commission and served it on the parties of record in Docket 01-0662. Reports, as required by the Plan, will be filed on a quarterly basis beginning in July 2003. As a result of the input received at the forum, a CLEC Billing subcommittee was established to identify, track and resolve CLEC billing issues. The committee has regular participation of over a dozen CLECs. And as of the committee's June 12, 2003 meeting, fifty-six billing issues had been raised, twenty of which had been resolved, and progress is being made to resolve the remaining issues. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
16	Line Loss Notifier Communications	SBC commits to file an Illinois-specific Line Loss Notifier Communication Plan that mirrors that plan filed in Michigan and commits to provide the Commission with the monthly Line Loss Notifier issues report described in that plan.	On May 1, 2003, SBC Illinois filed the Line Loss Notifier Communications Plan with the Commission and served it on the parties of record in Docket 01-0662. SBC Illinois filed reports on April and May activity, as described in the Plan, on June 2, 2003 and June 10, 2003 respectively. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
17	Change Management	SBC commits to file an Illinois-specific Change Management	On May 1, 2003, SBC Illinois filed the Change Management Communication Plan with the Commission and served it on the parties

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	Management Communication	specific Change Management Communications Plan and to provide the Commission with quarterly progress reports for one (1) year beginning April 30, 2003.	Communication Plan with the Commission and served it on the parties of record in Docket 01-0662. The first quarterly progress report, as required by the Plan, was filed on June 2, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
18	Pre-Order Processing Timeliness Plan	SBC will implement the plan on a Midwest regional basis and will provide the Commission with a report in July 2003 (quarterly thereafter, if needed) of the regional results associated with this plan.	On May 1, 2003, SBC Illinois filed the Pre-Order Processing Timeliness Plan with the Commission and served it on the parties of record in Docket 01-0662. A status report, as required by the Plan, will be filed in July 2003. The upgrade of the commercial EDI translator planned for June 28, 2003 was delayed and will be re-scheduled in the near future. This issue will be discussed in the status report due July 31, 2003. This commitment is completed. Reports will continue to be filed under the terms of the Plan.
19	BearingPoint Re-testing	SBC to implement corrective actions for TVV 1-4 (Order functionality) and PPR 13-4 (billing products process – error checking). SBC commits to address these issues and to use full and good faith efforts to have these items re-tested by BearingPoint by August, 2003.	These observations and exceptions have been corrected by SBC Illinois and closed successfully by BearingPoint. TVV1-4 was satisfied effective with the closing of observation 666 on April 15, 2003. PPR 13-4 was satisfied with the closing of exception 119 on March 18, 2003. This commitment is completed.
20	Billing Timeliness	SBC will take steps to correct unsatisfactory performance with respect to PM 17-billing timeliness and will subject it to additional	SBC Illinois provided Staff information on PM 17 in reports dated April 2, May 2 and June 4, 2003 as proposed in Jim Ehr's Surrebuttal affidavit. See Attachments 11, 12 and 13.

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		and will subject it to additional monitoring, as set out in Jim Ehr's Surebuttal affidavit.	<p>For April and May 2003, results for PM 17 demonstrated performance in parity with SBC Illinois retail or affiliate for seven of the eight submeasures. UNE, UNE-P and Lineshare submeasures have been in parity for both months.</p> <p><u>SBC Illinois provided Staff information on PM 17 in reports dated July 8 and August 6, 2003. The UNE, UNE-P and Lineshare submeasures continue to meet the parity standard. The Resale submeasure is the only submeasure that has not been in parity for both months. SBC Illinois continues to address performance on the Resale submeasure in the monthly "Key PMs" report to ICC Staff. See Attachments 1 and 2.</u></p> <p>This commitment is on schedule.</p>
21	Line Loss	SBC to correct the loss notification issue with partial migration of accounts.	<p>Software changes associated with partial migrations were completed by June 5, 2002. A further fix was made on March 7, 2003. Accessible Letters CLECAMs03-019 and CLECAMs03-021 distributed March 6, 2003 and March 14, 2003 informed CLECs of the issue. See Attachments 14 and 15.</p> <p>This commitment is completed.</p>
22	Line Loss	SBC to retrain its personnel to prevent loss notification problems arising from manual handling errors in local service centers.	<p>SBC Illinois developed a formal training package for service representatives on the line loss notification process. This four-hour training package was delivered to over 1000 service representatives beginning the week of May 26, 2002 and completing on July 31, 2002.</p> <p>This commitment is completed.</p>

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	Topic	Description of Commitment	Status
23	Line Loss	SBC to determine if other situations exist that cause line loss notifications to be inaccurate or untimely, and correct those situations immediately.	SBC Illinois has an on-going process through which it monitors and corrects any such situations that may arise. This commitment is completed.
24	Line Loss	SBC to clearly state all the problems it has uncovered relating to loss notifications since January 2001 and to communicate those in an Accessible Letter. The Accessible Letter should indicate when the problem was first identified, what software versions it lies to, what action SBC has taken to correct each issue and when the action was taken, any plan or future action SBC plans to take, and an estimate of when the action will be taken.	Accessible Letter CLECAM02-400 was distributed on September 24, 2002. This Accessible Letter included problem start and end dates, the scope of the problem, the corrective action taken and the timing of that action. See Attachment 16. In addition, Accessible Letters CLECAM02-122, CLECAM02-123, CLECAM03-019, CLECAM03-021 and CLECAM03-035 were distributed on November 12 and November 13, 2002 and March 6, March 14 and May 21, 2003 respectively. These letters were the initial notification and follow-up related to line loss incidences after the September Accessible Letter was distributed. See Attachments 17, 18, 14, 15 and 19. This commitment is completed. Any future issues will be reported consistent with the Line Loss Notifier Plan. This commitment is completed.
25	Line Loss	On a CLEC by CLEC basis, SBC to determine the accounts for which loss notifications have never been sent or incorrectly sent and will communicate these instances to the affected CLECs. If issues persist, such reconciliation will be done on a monthly basis until all issues have been resolved.	SBC Illinois has engaged in account reconciliation with individual CLECs in order to accommodate the business objectives and system capabilities of each CLEC. This has included activities such as resending line loss notifications for past periods, and providing reports of end user account status for comparison with the CLEC's customer database. Information regarding some of the reconciliation activities may be found in Accessible Letters CLECAM02-170 and CLECAM02-209. See Attachments 20 and 21.

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	Topic	Description of Commitment	Status
			This commitment is completed.
26	Line Loss	SBC commits to continue meeting with CLECs on an as needed basis to discuss the problems associated with loss notifications and the actions that SBC has taken to address them.	<p>SBC Illinois held an initial Line Loss Notification Workshop for interested CLECs on March 13-14, 2002. Follow-up calls were held on April 30, May 17, May 30, and June 28, 2002. In addition, SBC discusses LLN issues with CLECs as appropriate during regular monthly OSS Change Management (“CMP”) meetings and CLEC Users Forums.</p> <p>This commitment is completed.</p>
27	Line Loss	SBC commits to modify the process to notify its retail organization of a customer loss or to modify the process SBC uses to notify its wholesale carriers of a customer loss to bring them into parity with one another.	<p>SBC Illinois’ retail operations rely exclusively on the same Line Loss Notifications as those sent to CLECs pursuant to the Commission’s Order in Docket 02-0160.</p> <p>This commitment is completed.</p>
28	Line Loss	SBC will make line loss performance measure MI 13 a remedied performance measure. If tiers are applicable to the performance remedy plan then the measure will have a medium weight for both tier 1 and tier 2 payments or comparable remedy level	<p>Performance measure MI 13 is a remedied performance measure. Under the new Illinois 271 Remedy Plan, the low, medium and high weighting has been eliminated.</p> <p>This commitment is completed.</p>
29	Line Loss	SBC Illinois will implement all changes to performance measures MI 13 and MI 13.1 agreed upon in the last performance measurement six month review session including the	<p>Changes to the business rules were implemented effective with March 2003 results reported April 21, 2003.</p> <p>This commitment is completed.</p>

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	Topic	Description of Commitment	Status
		clarification that all line loss notices generated due to SBC Illinois winback scenarios are included in the MI 13 and MI 13.1 performance measurements;	
30	Line Loss	SBC Illinois will file revised tariff pages with the Commission for the changes it will make to performance measure MI 13 and MI 13.1 based upon this Order and the Company's commitments in this order, such that the effective date of the tariff will coincide with the implementation date of the performance measurement changes	SBC Illinois filed a tariff to fulfill this commitment on June 2, 2003. The tariff will become effective on July 17, 2003. The modified language is located in Ill. C.C. 20, Part 12, Section 11, Sheets 359, 359.1, 359.2, 359.3 and 412. See Attachment 22. This commitment is completed.
31	Line Loss	SBC Illinois will closely monitor the line loss notifications it provides to CLECs until such time as SBC Illinois provides a full six months of line loss notifications without any new problems being uncovered and without any of the existing or prior problems having resurfaced.	The SBC Illinois line loss notification cross-functional team continues to monitor the loss notification process on a daily basis. The cross-functional team will be maintained at least until June 30, 2003. SBC will evaluate the need for continuation at the end of the ICC's required reporting period and provide the ICC with a 30-day notice of any discontinuance. SBC Illinois is providing the Commission a monthly report of any line loss issues that were identified during the month as described in the Line Loss Notifier Communications Plan. See commitment 16. <u>The LSC continues daily monitoring of line loss notification activities. Any issues identified are provided to the cross- functional team that continues to meet to respond/resolve issues on an as needed basis.</u>

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	Topic	Description of Commitment	Status
			This commitment is on schedule.
32	Line Splitting	SBC commits to file tariff language that would establish a degree of comparability between the Company's provisioning of the UNEs necessary to support a line splitting arrangement and the Company's provisioning of HFPL for line sharing.	SBC Illinois filed a tariff to fulfill this commitment on June 5, 2003. The tariff became effective on June 6, 2003. The modified language is located in Ill. C.C. Tariff 20, Part 19, Section 2, Sheet 3.1 on June 5, 2003. See Attachment 23. This commitment is completed.
33	Performance Improvement	SBC commits to use its good faith, best efforts to remedy unsatisfactory performance on PMs 7.1, 13, 17, MI-2, MI-14, and 37-4, in accordance with the Order.	See Attachment 24. See Attachment 3. This commitment is on schedule.
34	Performance Improvement	SBC commits to use its good faith, best efforts to remedy performance on PMs C WI-6-02, 59-03, 65-03, 65.1-03, 67-03, 67-18 and 66-03, in accordance with the order.	See Attachment 25. See Attachment 4. This commitment is on schedule.
35	Performance Improvement	SBC Commits to keep monitoring the situation with respect to PM 55, in accordance with the terms of the Order.	SBC Illinois continues to monitor PM 55 and has provided monthly reports to Staff on April 2, May 2 and June 4, 2003. In its April report, SBC Illinois demonstrates that SBC has met the standard for PM 55.01.3 for two months and thus this PM will not be subject to further monitoring. SBC Illinois has implemented an Enhancement Request (ER) which includes in this measure only those orders with requested due dates of the standard interval for wholesale orders and the offered

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			<p>interval on SBC Illinois retail orders. With this enhancement, SBC Illinois met the standard for PM 55.01.1 in April. See Attachments 11, 12 and 13.</p> <p><u>SBC Illinois provided monthly reports to Staff on July 8 and August 6, 2003. See Attachments 1 and 2. In its July report, SBC Illinois demonstrates that it has met the standard for PM 55.01.1 for two months and thus this PM will not be subject to further reporting to ICC staff in the monthly “Key PMs’ report. Monitoring for PM 55, as for all PMs continues on a normal operational basis.</u></p> <p>This commitment is on schedule<u>completed</u>.</p>
36	RCF	SBC will make RCF available to CLECs as a resale offering and will work with Z-Tel to facilitate the availability of RCF as part of a UNE-P offering.	<p>On June 18, 2003, SBC Illinois issued Accessible Letter CLECAM03-209 which provides information for CLECs that are interested in providing a resale-based Remote Call Forwarding (RCF) Service to CLEC end-users that are provided their local service under a UNE-P arrangement. SBC Illinois continues to work to facilitate the availability of RCF as part of a UNE-P offering. See Attachment 26.</p> <p><u>As of this report, one CLEC has executed the amendment.</u></p> <p>This commitment is open.</p>
37	911 (PM 104)	SBC commits to pursue and explore with Staff and CLECs a more reasonable and workable standard for PM 104.	SBC Illinois will propose a performance measure for PM 104 at the next six month review collaborative. The next collaborative is expected to begin in August 2003.

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	Topic	Description of Commitment	Status
		PM 104.	<p><u>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</u></p> <p>This commitment is on schedule.</p>
38	PM 37-01	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	<p>SBC Illinois has provided reports to Staff on April 2, May 2 and June 4, 2003 regarding PM 37-01 and will continue to do so until it meets the performance standard for two consecutive months. See Attachments 11, 12 and 13.</p> <p><u>SBC Illinois provided reports to Staff on July 8 and August 6, 2003. See Attachments 1 and 2. For June results reported in July, SBC Illinois met the standard for PM 37-01.</u></p> <p>This commitment is on schedule.</p>
39	PM 37-04	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	<p>The first report was provided to Staff on April 2, 2003. As the results show that SBC has now met the standard for two months, this PM will not be subject to further reporting. See Attachment 11.</p> <p>This commitment is completed.</p>
40	Remedy Plan	SBC to send CLECs an Accessible Letter advising CLECs of the adoption of the Section 271 Plan.	<p>Accessible Letter CLECAM03-188 informing CLECs of the new Section 271 Plan was distributed on May 27, 2003. See Attachment 27.</p> <p>This commitment is completed.</p>

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	Topic	Description of Commitment	Status
41	Remedy Plan	SBC will modify the Compromise Remedy Plan to incorporate changes to the periodic audit provision.	SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding. This commitment is completed.
42	Remedy Plan	SBC will modify the Compromise Remedy Plan to incorporate “mini-audit” language of the 01-0120 plan.	SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding. This commitment is completed.
43	Remedy Plan	SBC will modify the Compromise Remedy Plan to include the “sign-up” and “exclusions” language of the 01-0120 plan.	SBC Illinois revised the Compromise Remedy Plan on April 30, 2003 and filed it with the Commission pursuant to the HEPO in this proceeding. This commitment is completed.
44	Remedy Plan	SBC will modify the Compromise Remedy Plan to delete a termination date. A future collaborative will investigate the term of the plan.	SBC Illinois revised the Compromise Remedy Plan on May 2, 2003 and filed it pursuant to the PEPO in this proceeding. This commitment is completed.
45	Remedy Plan	SBC will modify its tariff to comply with the order, will provide CLECs the opportunity to opt-in to the plan approved in this proceeding, and will incorporate the required opt-in language into its Compromise Remedy Plan	SBC Illinois filed a tariff to fulfill this commitment on June 4, 2003. The tariff became effective on June 5, 2003. The modified language is located in Ill. C.C. 20, Part 2, Section 11, Sheets 4, 4.1-4.37, 5-14, 14.1, 14.2, 15-17, 17.1, 18-31, 393 and 394. SBC Illinois revised the Compromise Remedy Plan to incorporate the required opt-in language on May 2, 2003 and filed it pursuant to the PEPO in this proceeding. See Attachment 28.

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	Topic	Description of Commitment	Status
			This commitment is completed.
46	Remedy Plan	SBC to participate in six month collaborative process as specified in the order	<p>The next six month review is expected to begin in August 2003.</p> <p><u>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</u></p> <p>This commitment is on schedule.</p>
47	PMs	SBC agreed to revise its PM tariff to add submeasures specific to EELs.	<p>SBC Illinois filed a tariff to fulfill this commitment on February 7, 2003. The tariff became effective on March 24, 2003. The modified language is located in Ill. C.C. 20, Part 2, Section 11, Sheets 209, 210.1, 221, 222.1, 228, 229, 231, 232, 234, 235, 237, 238, 240, 241, 243, 244, 249, 250, 252, 253, 257, 259, 262 and 263. See Attachment 29.</p> <p>This commitment is completed.</p>
48	PMs	SBC shall add a diagnostic measure that will assess the duration of the EEL certification process. Final Order, page 216.	<p>SBC Illinois will propose a diagnostic performance measure that will assess the duration of the EEL certification process at the next six month review collaborative. The next collaborative is expected to begin in August 2003.</p> <p><u>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</u></p>

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	Topic	Description of Commitment	Status
			This commitment is on schedule.
49	BearingPoint testing	SBC to address deficiencies noted by BearingPoint. BearingPoint to issue status report by November 28, 2003. SBC to respond to any open items, and the Commission to determine the appropriate resolution.	SBC Illinois continues to work with BearingPoint to address deficiencies. This commitment is on schedule.
50	All Equipment List	SBC will continue to update the list as needed.	SBC Illinois posts and maintains on its website a list of safety-compliant equipment known as the Illinois Safety Compliance Equipment List ("ISCEL"). SBC Illinois has implemented procedures to ensure timely quarterly updates to the ISCEL. The list can be found at the following URL: https://clec.sbc.com/clec_documents/unrestr/hb/13%20State/242/apdx/MW/Illinois_Safety_Compliant_Equipment_List_(ISCEL).pdf The list was updated on March 28, 2003. Estimated completion date for the next quarterly update is July 10, 2003. This commitment is completed. Updates will continue to be provided on a quarterly basis.
51	Power Cabling	SBC will allow CLECs to opt into the provision for power cabling in the McLeod agreement	SBC Illinois acknowledged its obligation on the record in Docket 01-0662 to permit CLECs to opt into the provision for power cabling in the McLeod agreement. SBC Illinois' Industry Markets organization is fully aware of this obligation and is ready to handle any such requests pursuant to the opt-in policies posted on the CLEC Online website. This commitment is completed.
52	E&Y Exceptions	SBC will provide periodic reports to Staff as to the status of E&Y	The final E&Y report was filed with the Commission on June 4, 2003.

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	Topic	Description of Commitment	Status
	Exceptions	exceptions, in a manner and time concurrent with its present reporting to the Michigan Commission	This commitment is completed.
53	BearingPoint PM review	SBC will address the deficiencies raised by BearingPoint in the metrics review and will use best and good faith efforts to facilitate the completion of testing by November 28, 2003. Thereafter, the Commission can determine the appropriate next steps.	SBC Illinois continues to work with BearingPoint on the metrics review. The Performance Metrics Project Plan released June 2, 2003 indicates that approximately 53% or 143 of the 270 applicable evaluation criteria have been satisfied. This commitment is completed.
54		SBC commits to complete any and all remedial actions the Commission deemed necessary to achieve compliance with the Commission's Phase I Interim Order.	This commitment is summary in nature and simply refers to the specific commitment items listed above. SBC Illinois has completed or is on schedule to complete all of these items. This commitment is on schedule.
55		SBC commits to exercising its best efforts to remedy each OSS and performance measurement deficiency that remains unresolved in accord with this order. These actions will further be verified by an independent third party.	This commitment is summary and nature and simply refers to the specific commitment items listed above. See commitments 11, 12, 13, 33, 34, 35, 49, and 53. This commitment is on schedule.
56		SBC commits to report to the Commission bi-monthly on progress toward meeting all remaining requirements, an obligation	This is the first of the bi-monthly progress reports required by this commitment item. <u>This is the second of the bi-monthly progress reports required by this</u>

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		commencing with the issuance of this Final Order and containing through competition of all required activity.	<p><u>commitment item. The first report was filed on June 30, 2003.</u></p> <p>This commitment is on schedule.</p>
57		SBC commits to participate in a collaborative composed of Staff, the Company and all interested parties to facilitate and monitor its progress toward eliminating the deficiencies indicated in the review of the 3-month PM data results.	<p>SBC Illinois will conduct this collaborative as an adjunct to the six-month review PM collaborative expected to begin in August 2003.</p> <p><u>The schedule for the next six-month collaborative was set on August 8. All proposed PM modifications, additions and deletions are due on September 15, with the first meeting to be held on September 25, 2003.</u></p> <p>This commitment is on schedule.</p>